

Appl. No. : 09/731,474  
Filed : December 6, 2000

### REMARKS

Applicant has the following comments in response to the above-office action.

#### Discussion of Claim Status

In the Office Action, the Examiner rejected Claims 1-4 and 12-14. The Examiner stated that Claims 5-11 and 15-23 were objected as being dependent on a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicant respectfully submits that Claim 5 and 15 have been rewritten to overcome these objections, and Applicant submits that these claims and their dependent claims, *i.e.*, Claims 6-11 and 16-23 are now in condition for allowance. In addition, by this paper, new Claims 24-39 have been presented.

#### Discussion of Claim Rejections Under 35 U.S.C. § 102(e)

In the Office Action, the Examiner rejected Claims 1-4, and 12-14, as being anticipated by U.S. Patent No. 6,269,484, to Simsic, et al. (hereinafter "Simsic"). Applicant respectfully disagrees with these rejections. One embodiment of the invention is directed to a filter for filtering compression artifacts from a decoded video sequence. These artifacts can result from the coarse quantization of a prediction error signal. Applicant respectfully submits that Simsic fails to teach or suggest filtering compression artifacts as is presently claimed.

#### Claims 1, 13 and 14

Independent Claim 1, as amended recites "a filter module coupled to the video decoder and the output and configured to *filter compression artifacts* from a decoded video sequence received from the video decoder, the filter module having a variable filter strength that is a function of detected motion activity within the video sequence." Independent Claims 13, and 14 include similar types of recitations. Applicant respectfully submits that a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described in a single prior art reference. *See* M.P.E.P. § 2131. Applicant respectfully submits that Simsic does not expressly teach or suggest at least the above recitations, and therefore the present claims are patentable over Simsic.

Simsic is directed to an apparatus for filtering interlaced signals for presentation on a non-interlaced display device. Interlaced display devices, such as television display devices typically display images using even and odd line interlacing. *See* Simsic, col. 1, lines 18-20. The interlaced video consists of one field of even line data and one field of odd line data, each field being displayed 30 times per second resulting in a complete frame being displayed 30 times a second. *See* col. 1, lines 21-24. When an interlaced signal is sent to a for display on a non-interlaced device, the non-interlaced device needs to “deinterlace” the signal so as to be able display a complete frame 60 times per second. *See* col. 1, line 24-26. During the deinterlacing process, certain edges in the non-interlaced signal need to be filtered. *See* col. 2, lines 45 and 46.

/ Thus, in contrast to filtering to remove compression artifacts, the focus of the filtering performed in Simsic is to blend adjacent odd and even lines. Simsic does not teach or suggest the need or how to remove artifacts that are due to compression of the video sequence. Compression artifacts can result from the coarse quantization of a prediction error signal. Filtering to remove artifacts caused by deinterlacing does not remove artifacts that originate as a result of video compression. Since Simsic does not teach or suggest filtering compression artifacts, Applicant respectfully submits that independent Claims 1, 13, and 14 are in condition for allowance.

#### Claims 2-4 and 24-44

Since Claims 2-4 and 24-28 each depend on one of Claims 1, 13, and 14, Applicant respectfully submits that these claims are allowable for at least the reasons discussed above and the subject matter of their own recitations. By this paper, Applicant has added new independent Claims 29, 33, 37, 41. Applicant respectfully submits that these new independent claims and their dependent claims, *i.e.*, Claims 30-32, 34-36, 38-40, and 42-44, are also allowable for at least the reasons discussed above.

#### Summary

Applicant has endeavored to address all of the Examiner’s concerns as expressed in the outstanding Office Action. Accordingly, amendments to the claims for patentability purposes, the reasons therefore, and arguments in support of the patentability of the pending claim set are presented above. Any claim amendments, which are not specifically discussed in the above


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remarks, are not made for patentability purposes, and the claims would satisfy the statutory requirements for patentability without the entry of such amendments. In addition, such amendments do not narrow the scope of the claims. Rather, these amendments have only been made to increase claim readability, to improve grammar, and to reduce the time and effort required of those in the art to clearly understand the scope of the claim language. In light of the above amendments and remarks, reconsideration and withdrawal of the outstanding rejections is specifically requested. If the Examiner has any questions that may be answered by telephone, he is invited to call the undersigned directly.

Respectfully submitted,

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